

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**CITY OF PITTSBURGH PROPERTY  
DEVELOPMENT, INC.,**

**Bankruptcy No. 17-22729-GLT**

**Debtor.**

**Chapter 7**

**JAMES R. WALSH, TRUSTEE  
OF THE BANKRUPTCY ESTATE OF  
CITY OF PITTSBURGH PROPERTY  
DEVELOPMENT, INC.,**

**Document No.**

**Related to Doc. No. 174**

**Movant,**

**Hearing Date and Time:  
November 29, 2018 at 10:00 a.m.**

**vs.**

**CITY OF PITTSBURGH PROPERTY  
DEVELOPMENT, INC.,**

**Respondent.**

**RESPONSE TO THE MOTION OF THE CHAPTER 7 TRUSTEE FOR ENTRY OF AN  
ORDER COMPELLING CITY OF PITTSBURGH PROPERTY DEVELOPMENT, INC.  
TO PRODUCE AND TURN OVER DOCUMENTS AND INFORMATION**

**AND NOW**, comes City of Pittsburgh Property Development, Inc., the Debtor in the above Chapter 7 Case, by and through its Counsel, Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl, and files this **RESPONSE TO THE MOTION OF THE CHAPTER 7 TRUSTEE FOR ENTRY OF AN ORDER COMPELLING CITY OF PITTSBURGH PROPERTY DEVELOPMENT, INC. TO PRODUCE AND TURN OVER DOCUMENTS AND INFORMATION**, as follows:

1. Admitted.
2. Admitted.
3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted

7. Admitted

8. It is admitted that Debtor's counsel and representatives spoke to the Trustee on or about February 16, 2018.

9. It is admitted that Debtor's counsel and representatives spoke to the Trustee on or about February 16, 2018.

10. The averments of this paragraph are denied to the extent that the Movant's characterization of the Order of Court differs from its plain terms, as the Order of Court is a written document which speaks for itself.

11. Admitted.

12. The averments of this paragraph are denied to the extent that the Movant's characterization of the bank statements and Check No. 001000 differ from their plain terms, as the bank statements and Check No. 001000 are written documents which speaks for themselves.

13. The averments of this paragraph are denied to the extent that the Movant's characterization of its emails and letters differ from their plain terms, as the emails and letters are written documents which speak for themselves. By way of further response, Counsel for the Debtor provided contact information for Hitesh Tanwani on November 11, 2018, via email.

14. The averments of this paragraph are legal conclusions for which no response is required. By way of further response, the Debtor incorporates its responses to Paragraph 13

15. The averments of this paragraph are legal conclusions for which no response is required. By way of further response, the Debtor incorporates its responses to Paragraph 13.

16. The averments of this paragraph are legal conclusions for which no response is required.

17. The averments of this paragraph are legal conclusions for which no response is required.

18. The averments of this paragraph are denied to the extent that the Movant's characterization of its email differs from their plain terms, as the email is a written document which speak for itself. By way of further response, Counsel for the Debtor provided contact information for Hitesh Tanwani on November 11, 2018, via email.

19. The averments of this paragraph are legal conclusions for which no response is required.

**WHEREFORE**, the Debtor respectfully requests that this Honorable Court deny the Motion.

Respectfully Submitted,

Date: November 12, 2018

/s/ Robert O Lampl  
ROBERT O LAMPL  
PA I.D. #19809  
JOHN. P. LACHER  
PA I.D. #62297  
DAVID L. FUCHS  
PA I.D. #205694  
RYAN J. COONEY  
PA I.D. #319213  
SY O. LAMPL  
PA I.D. #324741  
Counsel for the Debtor  
Robert O Lampl Law Office  
223 Fourth Avenue, 4<sup>th</sup> Floor  
Pittsburgh, PA 15222  
(412) 392-0330 (phone)  
(412) 392-0335 (facsimile)  
Email: [rlampl@lampllaw.com](mailto:rlampl@lampllaw.com)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**CITY OF PITTRBURGH PROPERTY  
DEVELOPMENT, INC.,**

**Bankruptcy No. 17-22729-GLT**

**Debtor.**

**Chapter 7**

**JAMES R. WALSH, TRUSTEE  
OF THE BANKRUPTCY ESTATE OF  
CITY OF PITTSBURGH PROPERTY  
DEVELOPMENT, INC.,**

**Document No.**

**Related to Doc. No. 174**

**Movant,**

**Hearing Date and Time:  
November 29, 2018 at 10:00 a.m.**

**vs.**

**CITY OF PITTSBURGH PROPERTY  
DEVELOPMENT, INC.,**

**Respondent.**

**CERTIFICATE OF SERVICE**

Robert O Lampl hereby certifies that on the 12<sup>th</sup> day of November, 2018, a true and correct copy of the foregoing **RESPONSE TO THE MOTION OF THE CHAPTER 7 TRUSTEE FOR ENTRY OF AN ORDER COMPELLING CITY OF PITTSBURGH DEVELOPMENT, INC. TO PRODUCE AND TURN OVER DOCUMENTS AND INFORMATION** was served upon the following (*via electronic service and/or email service*):

Office of the U.S. Trustee  
1001 Liberty Avenue  
970 Liberty Center  
Pittsburgh, PA 15222

Joseph S. Sisca  
Suite 960, Liberty Center  
1001 Liberty Avenue  
Pittsburgh, PA 15222  
[joseph.s.sisca@usdoj.gov](mailto:joseph.s.sisca@usdoj.gov)

Norma Hildenbrand  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh, PA 15222  
[Norma.L.Hildebrand@usdoj.gov](mailto:Norma.L.Hildebrand@usdoj.gov)

Kevin J. Petak  
Spence Custer Saylor Wolfe & Rose, LLC  
1067 Menoher Boulevard  
Johnstown, PA 15905  
[kpetak@spencecuster.com](mailto:kpetak@spencecuster.com)

James R. Walsh  
Spence Custer Saylor Wolfe & Rose LLC  
1067 Menoher Boulevard  
Johnstown, PA 15905  
[jwalsh@spencecuster.com](mailto:jwalsh@spencecuster.com)

Date: November 12, 2018

/s/ Robert O Lampl  
ROBERT O. LAMPL  
PA I.D. #19809  
JOHN. P. LACHER  
PA I.D. #62297  
DAVID L. FUCHS  
PA I.D. #205694  
RYAN J. COONEY  
PA I.D. #319213  
SY O. LAMPL  
PA I.D. #324741  
Counsel for the Debtor  
Robert O Lampl Law Office  
223 Fourth Avenue, 4<sup>th</sup> Floor  
Pittsburgh, PA 15222  
(412) 392-0330 (phone)  
(412) 392-0335 (facsimile)  
Email: [ramp@lampllaw.com](mailto:ramp@lampllaw.com)